

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

NO. 5:19-cr-149-BO (4)

UNITED STATES OF AMERICA)
vs.) INDICTMENT
SHANYNN KEMP)

The Grand Jury charges that:

COUNT ONE

Between on or about April 19, 2017, and on or about April 20, 2017, in the Eastern District of North Carolina and elsewhere, the defendant, SHANYNN KEMP, did, and attempted to, knowingly use intimidation, threaten, and corruptly persuade Witness 1, and engage in misleading conduct toward Witness 1, with the intent to influence, delay, and prevent the testimony of Witness 1 in an official proceeding; with the intent to cause and induce Witness 1 to withhold testimony from an official proceeding; and with the intent to hinder, delay, and prevent the communication to a law enforcement officer and judge of the United States of information relating to the commission and possible commission of a Federal offense; all in violation of Title 18, United States Code, Section 1512(b).

COUNT TWO

Between on or about April 19, 2017, and on or about April 20, 2017, in the Eastern District of North Carolina and elsewhere, the defendant, SHANYNN KEMP, did, and attempted to, knowingly use intimidation, threaten, and corruptly persuade Witness 2, and engage in misleading conduct toward Witness 2, with the intent to influence, delay, and prevent the testimony of Witness 2 in an official proceeding; with the intent to cause and induce Witness 2 to withhold testimony from an official proceeding; and with the intent to hinder, delay, and prevent the communication to a law enforcement officer and judge of the United States of information relating to the commission and possible commission of a Federal offense; all in violation of Title 18, United States Code, Section 1512(b).

COUNT THREE

Between on or about April 19, 2017, and on or about April 20, 2017, in the Eastern District of North Carolina and elsewhere, the defendant, SHANYNN KEMP, did, and attempted to, knowingly use intimidation, threaten, and corruptly persuade Witness 3, and engage in misleading conduct toward Witness 3, with the intent to influence, delay, and prevent the testimony of Witness 3 in an official proceeding; with the intent to cause and induce Witness 3 to withhold testimony from an official proceeding; and with the intent to hinder, delay, and prevent

the communication to a law enforcement officer and judge of the United States of information relating to the commission and possible commission of a Federal offense; all in violation of Title 18, United States Code, Section 1512(b).

COUNT FOUR

Between on or about April 19, 2017, and on or about April 20, 2017, in the Eastern District of North Carolina and elsewhere, the defendant, SHANYNN KEMP, did, and attempted to, knowingly use intimidation, threaten, and corruptly persuade Witness 4, and engage in misleading conduct toward Witness 4, with the intent to influence, delay, and prevent the testimony of Witness 4 in an official proceeding; with the intent to cause and induce Witness 4 to withhold testimony from an official proceeding; and with the intent to hinder, delay, and prevent the communication to a law enforcement officer and judge of the United States of information relating to the commission and possible commission of a Federal offense; all in violation of Title 18, United States Code, Section 1512(b).

COUNT FIVE

Between on or about April 19, 2017, and on or about April 20, 2017, in the Eastern District of North Carolina and elsewhere, the defendant, SHANYNN KEMP, did, and attempted to, corruptly conceal a record, document, and other object with the intent to impair the object's integrity and availability for use in an official proceeding; in violation of Title 18, United States Code, Section 1512(c)(1).

COUNT SIX

Between on or about April 19, 2017, and on or about April 20, 2017, in the Eastern District of North Carolina and elsewhere, the defendant, SHANYNN KEMP, did, and attempted to, corruptly obstruct, influence, and impede any official proceeding; in violation of Title 18, United States Code, Section 1512(c)(2).

A TRUE BILL

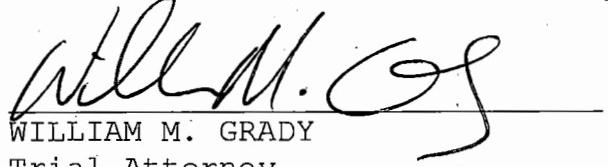
REDACTED VERSION

Pursuant to the E-Government Act and the federal rules, the unredacted version of this document has been filed under seal.

ROBERT J. HIGDON, JR.
United States Attorney

Date: 4/3/19


BY: MELISSA BELLE KESSLER
Assistant United States Attorney


WILLIAM M. GRADY
Trial Attorney